

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

VALVETECH, INC.,	:	
		Plaintiff,
v.	:	Case No. 6:17-cv-06788-FPG-MWP
AEROJET ROCKETDYNE, INC.,	:	
		Defendant.
	:	

**NOTICE OF AEROJET ROCKETDYNE'S MOTION TO
ORDER VALVETECH, INC. TO SERVE A REDACTED
VERSION OF THE REPORT OF MICHAL TIMKO LIMITED TO
VALVETECH'S PURPORTED TRADE SECRETS**

PLEASE TAKE NOTICE that defendant Aerojet Rocketdyne, Inc., by and through its attorneys of record, Steptoe and Johnson, will move, on a date and at a time to be determined by the Court, for an order: (1) requiring ValveTech to re-serve the Timko Report redacting only information that forms the basis of its trade-secret claims and without redacting any information currently in the possession of Aerojet Rockedyne's employees; (2) extending the deadline for serving responsive reports until one-month after a properly redacted Timko Report is received; and (3) granting any other relief the Court deems warranted. The grounds for this request are set forth in Aerojet Rocketdyne's Memorandum in Support of Aerojet Rocketdyne, Inc's Motion to Order ValveTech, Inc. To Serve A Redacted Version of The Report of Michal Timko Limited to ValveTech's Purported Trade Secrets.

PLEASE TAKE FURTHER NOTICE that the Memorandum, a redacted version of the Timko Report, an unredacted version of the Timko Report, and supporting declaration are all being submitted with a Motion to Seal. As explained in the declaration to the Motion to Seal, all

documents being submitted under seal include information identified by ValveTech as subject to the Protective Order in this case and/or information that has been designated export controlled.

Dated: March 31, 2021

By: *s/ Michael B. Eisenberg*
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